

SEALED

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States Courts
Southern District of Texas
FILED

MAR 16 2020

David J. Bradley, Clerk of Court

United States of America)

v.)

Liza Lee DIAZ)

Case No. C-20-946m)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 1-1-2020 to 1-31-2020 in the county of Nueces in the
Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description

21 U.S.C. § 846

Conspiracy to possess with the intent to distribute a controlled substance in
Schedule II of the Controlled Substance Act of 1970, to wit; more than 500
grams of a mixture or substance containing methamphetamine.

This criminal complaint is based on these facts:

See Attachment A

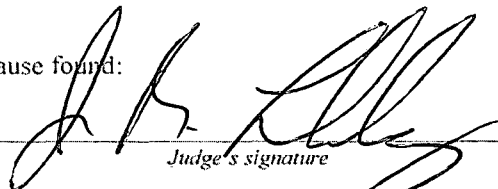
☒ Continued on the attached sheet.
Complainant's signature

Ryan Boyce, Special Agent

Printed name and title

Submitted by reliable electronic means, sworn to,
Signature attested telephonically per Fed. R. Crim.P.41, and probable cause found:

Date:

3-16-2020
Judge's signatureCity and state: Corpus Christi, Texas

Jason B. Libby, U.S. Magistrate Judge

Printed name and title

DIAZ, Liza Lee

ATTACHMENT "A"

On January 30, 2020, Texas Department of Public Safety (TXDPS) Trooper Clayton Trimm conducted a traffic stop on a 2010 Ford pickup truck operated by Liza DIAZ (hereinafter L. DIAZ) for failing to stop at a posted stop sign at the intersection of Pine Street and Shawnee Street in Corpus Christi, Texas. During the course of the traffic stop, TXDPS Trooper Trimm smelled a strong odor of marijuana emanating from the vehicle. A subsequent probable cause search of L. DIAZ's vehicle revealed there to be heroin inside the vehicle, as well as on L. DIAZ's person. L. DIAZ and two (2) other occupants inside the vehicle were subsequently arrested for Possession of Controlled Substance more than one (1) gram but less than four (4) grams (state). Two (2) cellular telephones were subsequently seized from L. DIAZ on this day.

Following the arrest, TXDPS agents conducted a post-arrest interview of one of the occupants in L. DIAZ's vehicle (hereinafter referred to as cooperating defendant). During this post-arrest interview, the cooperating defendant stated that L. DIAZ was a supplier of heroin and methamphetamine. The cooperating defendant continued to state that L. DIAZ was going to be receiving a parcel in the mail containing one (1) or two (2) kilograms of heroin and methamphetamine. The cooperating defendant stated that the parcel would be coming from the Phoenix, Arizona, area. The cooperating defendant stated that L. DIAZ's cellular telephone contained a plethora of information with respect to the trafficking of narcotics. The cooperating defendant stated that L. DIAZ's source of supply is saved in L. DIAZ's cellular telephone under the contact "Mexico".


On January 31, 2020, TXDPS Special Agent (SA) Blake Chapman secured a state search warrant for one of L. DIAZ's seized cellular telephones out of the 319th District in Nueces County, Texas. A quick search of L. DIAZ's cellular telephone revealed WhatsApp conversations between L. DIAZ and a contact saved as "Mexico". The conversations discussed narcotics being shipped from Arizona to Corpus Christi, Texas. On January 31, 2020, the "Mexico" contact provided a photograph of a UPS tracking number to L. DIAZ and stated that the parcel should be arriving on Monday, February 3, 2020. This WhatsApp text message string corroborated the statements of the aforementioned cooperating defendant.

On the same date, agents intercepted the aforementioned UPS parcel, which was identified by the tracking number provided by the contact saved as "Mexico" in L. DIAZ's cellular telephone. The parcel was intercepted in San Antonio, Texas. The parcel was destined for Corpus Christi, Texas. On the same date, following a positive canine alert on the parcel for the presence of narcotic odor emanating from the parcel, DEA Task Force Officer (TFO) Janelle Valle secured a state search warrant in Bexar County, Texas, to search the parcel. A subsequent search of the parcel by DEA San Antonio and San Antonio Police Department (SAPD) agents/officers revealed the parcel contained approximately 1.9 kilograms (gross weight) of suspected methamphetamine. SA Boyce knows, based on the cooperating defendant and the WhatsApp communication found in L. DIAZ's cellular telephone, that it was L. DIAZ who ordered and was expecting this 1.9 kilograms (gross weight) of methamphetamine to arrive to her (L. DIAZ) in Corpus Christi, Texas. SA Boyce notes that as recently as January 29, 2020, the contact "Mexico" in the seized cellular telephone refers to the individual he/she ("Mexico") is talking to on WhatsApp as "Liza" on multiple occasions. This again supports L. DIAZ's involvement in the parcel

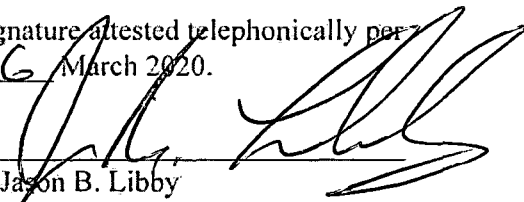
seized on January 31, 2020, containing approximately 1.9 kilograms (gross weight) of methamphetamine.

On March 15, 2020, DEA Special Agent Ryan Boyce contacted Assistant United States Attorney (AUSA) Lance Watt who authorized federal prosecution of Liza DIAZ for methamphetamine conspiracy.

From the amount of tangible methamphetamine seized [more than 500 grams of a mixture or substance containing methamphetamine]; I infer that the methamphetamine was intended for distribution.


Ryan Boyce, Special Agent
Drug Enforcement Administration

Submitted by reliable electronic means, sworn to, signature attested telephonically per Fed. R. Crim.P.41, and probable cause found: on 16 March 2020.


Jason B. Libby
United States Magistrate Judge